

CAUSE NO. D-1-GN-20-000078

WILLIAM MCGUIRE,
Plaintiff,

v.

ANTHONY LAUGHLIN,
Defendant.

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IN THE DISTRICT COURT

TRAVIS COUNTY, TEXAS

98th JUDICIAL DISTRICT**DEFENDANT'S FIRST AMENDED ANSWER**

Defendant Anthony Laughlin ("Laughlin" or "Defendant") files this, his *First Amended Answer*, and offers the following in support:

I. GENERAL DENIAL

1. Mr. Laughlin denies each and every, all and singular, material allegation of fact and law contained in Plaintiff's *First Amended Original Petition* and any amendment and supplements thereto and demands strict proof of the same.
2. Mr. Laughlin hereby expressly reserves the right to amend, clarify, revise, or correct any or all of the responses, objections, or assertions contained herein, and to assert additional objections or privileges, in one or more subsequent supplemental response(s).

II. AFFIRMATIVE DEFENSES

3. Notwithstanding the above *General Denial*, Mr. Laughlin asserts the following affirmative defenses to the claims made against him in Plaintiff's *First Amended Original Petition*:
 - a) Failure to mitigate;
 - b) Release;
 - c) Impossibility/impracticability of performance;
 - d) Accord and satisfaction;
 - e) Ratification;
 - (f) Waiver.

III. CONCLUSION

Mr. Laughlin respectfully prays that the Court render final judgment that Plaintiff takes nothing by his suit, award Defendant his reasonable and necessary attorney fees, costs of court, and all other relief, at law, or in equity, to which the Court deems him justly entitled.

Respectfully submitted,

/s/ Adrian Resendez

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**ATTORNEYS FOR
DEFENDANT**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Defendant's *First Amended Answer* has been sent to all counsel of record on August 24, 2020, as indicated below:

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Katherine Gallagher on behalf of Katherine Gallagher
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Associated Case Party: William McGuire

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